

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re Orly Genger, Debtor.	Chapter 7 Case No. 19-13895-JLG
DALIA GENDER, Plaintiff, -against- ORLY GENDER, MICHAEL BOWEN, ARIE GENDER, ARNOLD BROSER, DAVID BROSER, ERIC HERSCHMANN, THE GENDER LITIGATION TRUST, ADBG LLC, TEDCO INC., and DEBORAH PIAZZA as chapter 7 trustee, Defendants.	Adv. P. No. 20-01010

DECLARATION OF MICHAEL PAUL BOWEN

MICHAEL PAUL BOWEN, an attorney duly admitted to practice law before this Court, hereby makes the following declaration pursuant to 28 U.S.C. § 1746:

1. I am a member of Kasowitz Benson Torres LLP (“KBT”), and submit this declaration in support of my and Eric Herschmann’s Joinder in Motion to Dismiss Amended Complaint brought by Dalia Genger.

2. Attached hereto as Exhibit A is a true and correct copy of a compilation of (i) the Settlement Agreement and Release, dated June 16, 2013, amongst the “AG Group” and the “Trump Group,” as those terms are defined in that agreement, (ii) the two Subordinated Notes each dated June 16, 2013, (iii) the First Amendment to Settlement Agreement and Release, executed by the AG Group and the Trump Group in 2017, and (iv) the two agreements each entitled First Amendment to Subordinated Note, each dated November 20, 2017.

3. Attached hereto as Exhibit B is a true and correct copy of the transcript of the deposition of Michael Bowen, dated October 5, 2018.

4. Attached hereto as Exhibit C is a true and correct copy of two UCC filings made on behalf of secured party Eric Herschmann, filed May 10, 2017 and May 15, 2017.

I, Michael Paul Bowen, declare under penalty of perjury that the foregoing is true and correct.

Dated: June 25, 2020

/s/ Michael Paul Bowen
Michael Paul Bowen